REMARKS

Reconsideration and withdrawal of the rejections set forth in the Office Action dated July 27, 2005 are respectfully requested. Claims 67-70 are new. Claims 24, 26-36, and 51-70 are currently pending this application.

Response to Arguments

The Examiner assumes that for any limitation not argued by the applicant, the applicant agrees that the previous office action shows the prior art used meet those limitations. The applicants respectfully but firmly deny that this is the case. Rather, the applicants believe that the claims are allowable over the prior art for *at least* the reasons provided.

REJECTIONS UNDER 35 U.S.C. § 112

Claims 24, 26-36, and 61-66 were rejected under 35 U.S.C. § 112, second paragraph, as being indefinite for failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. Where appropriate, the applicants have amended the claims for clarity and for no other reason. The applicants respond in turn to each of the rejections, as enumerated in the Office Action pages 3-6.

1.   With respect to claim 24, the Examiner asserts that the meaning of "encrypting the requested content, if the requested content is static, using a third secure session protocol..." is unclear. The applicants disagree. The text sets apart the phrase "if the requested content is static" between commas. The meaning is clear. The Examiner's suggestion "encrypting the requested content; if the requested content is static, using a third secure session protocol..." changes the intended meaning of the text from a conditional encrypting to encrypting followed by a conditional using a third secure session protocol.

2. The Examiner noted a clerical error in claim 24, which has been amended as the Examiner suggests. The applicants thank the Examiner for identifying this error.

3. With respect to claim 26, the Examiner asserts that the meaning of "encrypting the requested content, if the requested content is static, using a third secure session protocol..." is unclear. Again, the applicants disagree and respectfully request the Examiner reconsider and withdraw the rejection.

4. The Examiner noted a clerical error in claim 61, which has been amended as the Examiner suggests. The applicants thank the Examiner for identifying this error.

5. With respect to claim 64, the Examiner asserts that the meaning of "encrypting the requested content, if the requested content is static, using a third secure session protocol..." is unclear. Again, the applicants disagree and respectfully request the Examiner reconsider and withdraw the rejection.

6. The Examiner noted a clerical error in claim 64, which has been amended as the Examiner suggests. The applicants thank the Examiner for identifying this error.

7. The dependent claims are believed to be allowable for depending from allowable base claims.

REJECTIONS UNDER 35 U.S.C. § 103(a)

Claims 24, 26-36, 61-62, and 64-65 were rejected under 35 U.S.C. § 103(a) as being unpatentable over the Netscape Proxy Server Administrator's Guide (NPSA) in view of US Patent No. 6,216,212 (Challenger et al.). Claim 51 was rejected under 35 U.S.C. § 103(a) as being unpatentable over the NPSA in view of US Patent Publication No. US 2002/0015497 (Maruyama et al.) and further in view of Challenger et al. Claims 52-55, and 58 were rejected under 35 U.S.C. § 103(a) as being unpatentable over NPSA and Maruyama et al. Claims 56 and 57 were rejected under 35 U.S.C. § 103(a) as being unpatentable over NPSA in view of Maruyama et al. and WO 01/03398 (Bellwood et al.) and further in view of Challenger et al. Claim 59 was rejected under 35 U.S.C. § 103(a) as being unpatentable over NPSA in view of Maruyama and further in view of Challenger et al. and applicant's admitted prior art. Claims 60, 63, and 66 were rejected under 35 U.S.C. § 103(a) as being unpatentable over NPSA in view of Challenger et al. and Bellwood et al. and further in view of applicant's admitted prior art.

The applicants note that Bellwood et al. is not prior art. Bellwood was published on January 11, 2001, which is less than 1 year before the filing date of the present application (July 9, 2001) and is later than the priority date of the present application (August 7, 2000). Bellwood, therefore does not qualify as prior art under 102(b). With respect to 102(e), Bellwood applies "only if the international application designated the United States" (see U.S.C. § 102(e)). Bellwood did not designate the United States. Accordingly, Bellwood does not qualify as prior art under 102(e), either.

The Prior Art

The NPSA apparently discloses an administrator guidebook for configuring Netscape proxy server software. The applicants point out that, as described in the specification at page 10, lines 13-15:

While TLS and other secure network protocols typically prevent the intermediate storing of secure static content on a reverse proxy, the architecture described herein enables such content to be cached.

The NPSA does not describe a secure network protocol wherein intermediate storing of secure static content on a reverse proxy is possible. The Examiner, at page 8 of the Office Action, states that "a previous office action already established that NPSA showed the requested content being encrypted and stored in local memory of the SRP." The applicants respectfully disagree with the Examiner and cannot find the Office Action in which this fact was established.

In the Office Action dated August 12, 2003, the Examiner asserted on page 12 that "Chapter 9 [of the NPSA] talks about future requests by the client being accessed from the SRP in paragraph four. It says that 'when a client requests a document that was previously requested and copied into the proxy cache, the proxy returns the document from the cache instead of retrieving the document from the remote server again.'" However, this does not show that requested content is encrypted and stored in local memory of the SRP. In fact, the NPSA clearly indicates that the default for secure content is no caching. The NPSA mentions that the default can be turned off in Chapter 9, page 9, which includes the text:

"If clients frequently request a secure document through your proxy, you may want to store it in the cache. By storing the document in the

cache, you avoid the encryption and decryption process, minimizing the time it takes to retrieve the document.

"If you do not enable the caching of HTTPS documents, the proxy assumes the default, which is to not cache them."

Thus, if content is cached at the proxy, the content is stored *without* encryption and is therefore not secure. Indeed, the effect of turning off the default is to render the content insecure so that a client can request the content and *avoid encryption/decryption*.

In the Office Action dated February 2, 2004, the Examiner asserted on page 5 that "The figure 7.4 show that whatever information that is being sent from the proxy to the client is encrypted.... Further limitation of 'storing the encrypted requested content locally in a memory at the at least one SRP' is met by Chapter 9, in the 'How Caching Works' section." However, the NPSA consistently presumes secure content is *not cached* at a reverse proxy. For example, FIG. 7.4 of the NPSA shows a typical diagram of a request for secure content that would not include caching of the secure content. If the content is cached at a proxy, the NPSA explicitly teaches that the content is *not encrypted* and therefore not secure.

In the Office Action dated August 5, 2004, the Examiner indicated at page 4 that the due to Chapter 14, first and second pages, which discloses encryption and a proxy server, a third session for encrypting the requested content for storing that content locally in a proxy server (SRP) is inherent. However, since the NPSA explicitly teaches away from this, the Examiner cannot properly claim that this is inherent.

After a careful review of the NPSA, the applicants are unable to find a teaching of "encrypting the requested content, if the requested content is the static content, using a third secure session protocol for storing the encrypted requested content locally in a memory at the at least one SRP, wherein the third secure session protocol

is known only to the at least one SRP[,]" as claimed in claim 24, or any similar teaching. Indeed, the only teaching that the applicants have found that is on point in this regard is found in Chapter 9, page 9, of the NPSA, where the NPSA *explicitly teaches away from* encrypting the content and storing the encrypted content locally at the SRP.

The Examiner asserted at page 8 that "[a] previous office action showed that the limitation [of claim 25] was met by Bellwood on page 3, lines 31-36." However, Bellwood is not prior art, as previously explained.

Maruyama et al. apparently discloses a license hub that includes a hub apparatus to which one or more apparatus and devices can be electrically connected, and a safe storage device for storing therein keys used to decode the encrypted contents data is added to the existing system to construct a license network. A controller of the license network acquires the information of various kinds of apparatuses and devices which are electrically connected to the license hub, and determines automatically the apparatus and/or the device suitable for executing the processing when carrying out the playback of contents or movement of the key to execute these processes. Notably, Maruyama et al. fail to disclose a reverse proxy that encrypts and caches secure content locally.

The Prior Art Distinguished

With respect to claim 24, the Examiner has made no assertion that Challenger et al. makes up for the deficiency of the NPSA reference, and Bellwood et al. is not prior art. Accordingly, the applicants respectfully assert that claim 24 is allowable over the prior art of record.

Claims 26-36 and 60 depend from claim 24, and are allowable for at least that reason. Claims 30-33 include protocols that prohibit intermediate storing of secure static content on a reverse proxy. Accordingly, these claims are allowable over the prior art for at least this additional reason.

With respect to claim 51, the Examiner has made no assertion that Challenger et al. or Maruyama et al. include "encrypting the static content before storing the static content in a secure local cache for future requests for the content" on an SRP, as recited claim 51. Accordingly claim 51 is allowable over the prior art of record, as are claims 52-59, which depend from claim 51.

Claims 61 and 64 include limitations related to storage of encrypted secure content at a reverse proxy. Accordingly, claims 61 and 64 are allowable for similar reasons to those described with reference to claim 24. Claims 62-63 and 65-66 are allowable at least for depending from an allowable base claim.

New Claims

Claim 67 includes, in part, the language:

> obtaining, by way of the second secure session, secure static content from the web server at the SRP;

> caching the secure static content at the SRP.

> sending, by way of the first secure session, the secure static content from the SRP to the client.

Advantageously, although the first secure session and the second secure session "[prevent] intermediate storing of secure static content on a reverse proxy[,]" as is also recited in claim 67, caching of secure content is nevertheless accomplished. The applicants respectfully submit that the prior art does not teach the caching of *secure* static content at a reverse proxy. Therefore, the prior art does not teach each and every element of claim 67 and claim 67 is allowable over the prior art of record. Claims 68-70, which depend from claim 67, are allowable for at least the same reason.

CONCLUSION

Applicant believes that all pending claims are allowable and a Notice of Allowance is respectfully requested. The amendment was made to expedite the prosecution of this application. Applicant respectfully traverses the rejections of the amended claims and reserves the right to re-introduce them and claims of an equivalent scope in a continuation application.

If the Examiner believes that a conference would be of value in expediting the prosecution of this application, he is cordially invited to telephone the undersigned counsel at (650) 838-4305.

Respectfully submitted,
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